

# EXHIBIT E

**From:** Adam Slater <ASlater@mazieslater.com>  
**Sent:** Wednesday, January 6, 2021 4:18 PM  
**To:** Goldberg, Seth A.; Priselac, Jessica  
**Cc:** Cheryll Calderon; Christopher Geddis; Layne Hilton; George T. Williamson  
**Subject:** ZHP deposition schedule and deposition lengths

Hello Counsel:

I am writing to advance our ongoing discussions to set the schedule of the ZHP witness depositions, and arrive at agreed lengths.

Before addressing the deposition schedule, I wanted to confirm for you that we will likely split up a number of the depositions using different questioners to cover different parts of the depositions, so that we can manage to take the massive number of depositions we must undertake over the next few months with regard to ZHP and the other manufacturers. The deposition notices will provide this information with regard to each deposition.

We are still awaiting proposed dates for the witnesses who Judge Schneider recently found to be appropriate, including but not limited to Mr. Chen. It is important for us to know what dates are proposed as we need to consider all depositions in determining whether to agree to the schedule, or discuss proposed modifications.

Second, we have given a great deal of thought to appropriate lengths of the scheduled depositions. The lengths set forth below do not factor in the 75% additional time per the deposition protocol, which will be added to the lengths once agreed to or ordered.

With regard to witnesses who are only being produced as fact witnesses, and not also as 30 b 6 witnesses, we can agree to conduct those depositions in one day (plus 75% where applicable).

As you insisted that the depositions be split between 30 b 6 deposition topics, and followed by the individual fact witness deposition, we have factored in one day for the fact witness deposition, and then worked to evaluate the number, combination, and nature of 30 b 6 topics assigned to the witness, in order to arrive at a reasonable length of deposition time for the 30 b 6 topics, as follows:

Lijie Wang - 1.5 days

Hai Wang - 2.5 days (You advised that certain categories will be shared with other 30 b 6 deponents, in an email or during our next meet and confer we request that you explain how the topics are being split up for this and other witnesses for whom this applies, so we can factor that in and prepare)

Linda Lin - 2 days

Jie (Jay) Wang - 2 days

Hong (Eric) Gu - 2 days

Jucai Ge - 3 days

Minli Zhang - 3 days

Qiangming Li - 2.5 days

Peng Dong - 2.5 days

Min Li - 2.5 days

Please let us know when you would like to discuss. To the extent you believe any of the proposed deposition lengths to need to be modified, we look forward to discussing your position. Please keep in mind the need to avoid overlapping depositions as well.

Thank you,

Adam Slater